

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT
FOR TENNESSEE AT NASHVILLE

Case No: 3:22-cv-00920

Corey Taylor

Plaintiff

v.

Trinity Services Group

Defendant

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JAN 07 2025

US DISTRICT COURT
MID DIST TENN

Plaintiff's petition in opposition to

DOC. NO. 77

Come now Plaintiff Corey Taylor, pro se seeking to move this court to
enter an objection and deny Doc. No. 77 for the following reasons as followed:

Plaintiff sought the assistance of the court because he is a prisoner and without
resources and to obtain the evidence that Defendants states he lacks plaintiff can
only obtain such by way of court order. Plaintiff is not engaging in discovery which
Defendants failed to comply with. Plaintiff is not seeking discovery and Defendants is
basically calling plaintiff a liar and for plaintiff to turn the check and prove otherwise he
must seek the resources of this court because plaintiff cannot obtain the documents he seeks
without a court order. The policies of Wellpath will not allow plaintiff to obtain his medical
records or any declarations without a court order. Plaintiff can prevail on all claims
only if he is granted resources. Plaintiff is indigent and have no support and was injured
due to the reckless acts of Trinity whom was deliberately indifferent to plaintiff's serious
medical needs which due to such indifference plaintiff was injured as a result. Plaintiff
cannot have the documents he is seeking in his possession except he gains them

cont'd

By a through the court, Plaintiff is By No means asking this court to act as his counsel. plaintiff is only seeking a court order to Obtain Documents and to take oral / verbal Depositions and to be able to locate those parties he has submitted unto the court.

AFFIDAVIT

I, Corey Taylor being the Plaintiff in this action Do solemnly swear under the penalty of law and perjury that I was

① Injured by the Reckless, negligent, Careless, Deliberate Indifferent acts of Trinity,

② I was served spicy meals Despite the labels stating "Non-Spicy Bland Diet". I was given meals inconsistent with my Diet and as a Result I was Injured and suffered Irreparable harm

③ I was Diagnosed with oral lichen Planus Mucositis By oral surgeon OMFs DR. Brian Hoang Nguyen.

④ I was ordered and prescribed a non-spicy Bland Diet and Trinity was Careless and Reckless in providing that Diet and I was Injured as a Result.

I, Declare under the Penalties and laws of perjury that all is accurate and True according to the laws of this state and the United States. Executed 12/29/2024

WHEREFORE, Plaintiff Prays the court will assist him or Issue orders that'll allow him to gain Documents to prove his case since Defendants claim that the Medical

Records Plaintiff submitted are insufficient. Plaintiff is seeking this court because he is now housed in Administrative Protective Custody and has absolutely no access to the law library and is without any resources as he is an inmate and is under the rules and regulations of TDOC. Plaintiff does have a diagnosed serious medical condition and was injured and suffered irreparable injuries by Trinity. Plaintiff will succeed on the merits only if the court issues orders as requested. Plaintiff is entitled to all relief sought and that this court also deems fair and just. All cost shall be taxed to defendant and a jury shall be impaneled of the maximum allowed.

Respectfully Submitted
Cory Taylor

Conclusion

Plaintiff's request shall be granted. The court shall be made aware that plaintiff is seeking legal counsel.

Certificate of Service

I, Attest that on this 30th day of December 2024 the foregoing was placed in T.C.I.X. inmate mail to be mailed to 719 Church St, Nashville, TN 37203 Attn: U.S. Dist. Court. Clerk via U.S. Postal Service with First-Class postage taxed to Plaintiff

Respectfully Submitted
Cory Taylor

Privileged
Legal Mail

Corey Taylor
#534419
T.C.I., X.
1449 R.W. Moore Memorial Hwy
ONLY TN 37140

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U.S. District Court
JAN 07 2025
Middle District of Tennessee
US DISTRICT COURT
MID DIST TENN (ATTN: Clerk of Court)

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